

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ATLANTIC SPECIALTY INSURANCE  
COMPANY, a New York company; MARKEL  
AMERICAN INSURANCE COMPANY, a  
Virginia corporation,

Plaintiffs,

vs.

MATT GODDEN, an individual; HARLEY  
FRANCO, an individual; HMS PARTNERS,  
LLC, a Washington company,

Defendants.

No. 2:21-cv-01244-BJR

**NOTICE OF SETTLEMENT**

NOTICE IS HEREBY GIVEN that all parties have reached a settlement in this matter. All claims by any party each against the other have been resolved. Any pending motions or other hearings in this matter may be stricken from the Court calendar. The parties are in the process of fully executing the settlement documents and once executed, will file a stipulation to dismiss this matter.

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NOTICE OF SETTLEMENT – 1  
Cause No.: 2:21-cv-01244-BJR

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**FORSBERG & UMLAUF, P.S.**  
ATTORNEYS AT LAW  
901 FIFTH AVENUE • SUITE 1400  
SEATTLE, WASHINGTON 98164  
(206) 689-8500 • (206) 689-8501 FAX

1 DATED this 15<sup>th</sup> day of September 2022.

2 FORSBERG & UMLAUF, P.S.

3  
4 s/Ryan J. Hesselgesser  
5 Ryan J. Hesselgesser, WSBA #40720  
6 Attorneys for Plaintiff Atlantic Specialty  
7 Insurance Company

DATED this 15<sup>th</sup> day of September 2022.

WILSON SMITH COCHERN  
DICKERSON

s/Lisa C. Neal  
Lisa C. Neal, WSBA #25686  
John M. Silk, WSBA #15035  
Attorneys for Plaintiff Markel American  
Insurance Company

8 DATED this 15<sup>th</sup> day of September 2022.

9 KAUFMAN BORGEEST & RYAN LLP

10  
11 s/Michael F. Perlis  
12 Richard R. Johnson  
13 Michael F. Perlis  
14 Attorneys for Markel American Insurance

DATED this 15<sup>th</sup> day of September 2022.

PERKINS COIE, LLP

s/Joseph E. Bringman  
Ronald Berenstein, WSBA #7573  
Sean C. Knowles, WSBA #39893  
Joseph E. Bringman, WSBA #15236  
Attorneys for Defendant Matt Godden

15  
16 DATED this 15<sup>th</sup> day of September 2022.

17 MARINO, TOTORELLA & BOYLE, P.C.

18  
19 s/John D. Tortorella  
20 Kevin H. Marino  
21 John D. Tortorella  
22 John A. Boyle  
23 Attorneys for Defendant Matt Godden

**CERTIFICATE OF SERVICE**

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing ***NOTICE OF SETTLEMENT*** on the following individuals in the manner indicated:

Mr. John M. Silk  
Ms. Lisa C. Neal  
Wilson Smith Cochran Dickerson  
1000 Second Ave., Suite 2050  
Seattle, WA 98104

(X) Via Email  
(X) Via ECF

Mr. Kevin H. Marino  
Mr. John D. Tortorella  
Mr. John A. Boyle  
Marino, Tortorella & Boyle, P.C.  
437 Southern Blvd.  
Chatham, NJ 07928

(X) Via Email  
(X) Via ECF

Mr. Ronald Berenstein  
Mr. Sean C. Knowles  
Mr. Joseph E. Bringman  
Perkins Coie, LLP  
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Seattle, WA 98101

(X) Via Email  
(X) Via ECF

Mr. Michael F. Perlis  
Mr. Richard R. Johnson  
Kaufman Borgeest & Ryan LLP  
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Woodland Hills, CA 91367

(X) Via Email  
(X) Via ECF

**SIGNED** this 15<sup>th</sup> day of September, 2022, at Seattle, Washington.

s/Abbie L. Robinson  
Abbie L. Robinson